



# State of Utah

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TO: Internal File

FROM: Michael Suflita, Reclamation Hydrologist and Team Lead *ms*

RE: Water Monitoring Update, Co-Op Mining Co., Bear Canyon Mine, C/015/025-01G, Outgoing File.

## SUMMARY:

On May 30, 2002 the Division received a proposed amendment to change the water-monitoring plan due to progression of the mining. This is a review of that amendment. There are two deficiencies.

## TECHNICAL ANALYSIS:

## OPERATION PLAN

## HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

## Analysis:

### Ground-water monitoring

The proposed amendment has three changes to the groundwater-monitoring plan. The reasons and rationale for these changes are contained in the cover letter that accompanies the two revised pages and three revised maps. Considering the reasons and rationale, the changes appear approvable. However, those explanations NEED to be included in the Mining and Reclamation Plan (MRP). The MRP is a document explaining the overall operation of the mine, including changes to the plan. That means when changes, such as to water monitoring, are made, the why

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and wherefore must also be included. Otherwise, the change simply shows up and no one reading the plan knows why. Readers include many varied audiences so this explanation needs to be included.

When providing the changes to the MRP, also include added information, from a Hydrologic standpoint, on why it's appropriate to include flows from the abandoned SBC-13 into the new SBC-11.

**Findings:**

Information provided in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the Permittee must provide the following in accordance with:

**R645-301-731.200, 1)** Include explanations for the proposed changes in the Mining and Reclamation Plan (MRP), and **2)** Include added information, from a Hydrologic standpoint, on why it's appropriate to include flows from the abandoned SBC-13 into the new SBC-11.

**RECOMENDATIONS:**

The amendment should not be approved in its present form.